

Invoice submitted to:
(Mis Hijos) Manuel de Jesus Rosario

Invoice Date
April 03, 2020

Professional Services

		Hours	
7/27/2015 ED	Draft Draft Complaint	1.25	\$375.00
8/3/2015 ED	File File initiating documents	0.50	\$150.00
8/10/2015 ED	Draft Draft Affidavits of Service	0.50	\$150.00
8/11/2015 ED	File File Service Affidavits	0.17	\$50.00
10/14/2015 ED	Preparation Preparation of damages calculations	1.05	\$315.00
SR	Telephone call with opposing Attorn Preparation of damages calculations	0.25	\$100.00
10/21/2015 SR	Draft Draft joint statement	0.90	\$360.00
ED	Revise Revise Preliminary Statement	0.92	\$275.00
10/22/2015 SR	Conference with client Conference with Def counsel	0.50	\$200.00
SR	Draft Draft initial conf order	1.00	\$400.00

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		<u>Hours</u>	
10/22/2015 ED	Revise Revise Preliminary Statement	0.70	\$210.00
10/28/2015 SR	Review Review damages for Ct conf	0.60	\$240.00
10/30/2015 SR	Court Appearance Court Appearance Initial Conf	1.00	\$400.00
SR	Travel Travel for appearance	0.67	\$133.33
12/7/2015 SR	Conference with client Conference with Def atty	0.50	\$200.00
12/8/2015 SR	Review Review damages for conf	0.40	\$160.00
12/9/2015 SR	Conference with client Conference with Ct (J Freeman	0.50	\$200.00
SR	Conference with client Teleconference with Court	0.67	\$266.67
SR	Meeting Meeting with client	0.50	\$200.00
ED	Meeting Meeting with client	0.50	\$150.00
ED	Draft Draft Second Set of Interrogatories	0.42	\$125.00
2/4/2016 ED	Court Appearance Court Appearance: Teleconference	0.72	\$215.00
3/8/2016 ED	Review Review Defendant's Demands for Interrogatories	0.25	\$75.00
3/9/2016 ED	Court Appearance Court Appearance: Teleconference	1.00	\$300.00
3/31/2016 ED	Draft Draft response letter	0.33	\$100.00
ED	Conference with client Conference with client re discovery responses	1.00	\$300.00

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		<u>Hours</u>	
4/7/2016 ED	Draft Draft interrogatory responses	1.67	\$500.00
4/8/2016 ED	Draft Draft interrogatory responses	1.10	\$330.00
4/11/2016 ED	Review Review file and prepare for conference + legal research re compelling party to sign authorizations	0.75	\$225.00
ED	Court Appearance Teleconference with Court	0.95	\$285.00
4/18/2016 ED	Telephone call with opposing Attorn Phone with OC re settlement and deposition scheduling	0.27	\$80.00
ED	Draft Draft corr to Court re deposition scheduling	0.50	\$150.00
5/26/2016 ED	Telephone call with opposing Attorn Telephone call with opposing Attorney	0.55	\$165.00
6/2/2016 SR	Court Appearance Court Appearance Settle Conf	5.20	\$2,080.00
ED	Court Appearance Court Appearance Settle Conf	5.20	\$1,560.00
ED	Preparation Preparation for Conference	1.00	\$300.00
ED	Travel Settlement Conference Travel	0.58	\$87.50
SR	Travel Settlement Conference Travel	0.58	\$116.67
6/13/2016 SR	Court Appearance Court Appearance	1.30	\$520.00
7/14/2016 SR	Draft Draft corr re juris and discovery, research re juris	0.90	\$360.00
SR	Review Review docs from production re juris limit	0.60	\$240.00

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		<u>Hours</u>	
7/15/2016	SR Conference with client Conference with Court re depositions	0.60	\$240.00
ED	Draft Draft corr to Court re depositions	1.20	\$360.00
7/18/2016	SR Conference with client Conference with client	0.70	\$280.00
ED	Conference with client Conference with client	1.50	\$450.00
7/19/2016	SR Conference with client Conference with Ct, draft email,	0.60	\$240.00
7/20/2016	SR Draft Draft corr re depos, conf Def counsel, Preparation deposition	2.20	\$880.00
7/21/2016	SR Preparation Preparation for depositon	1.00	\$400.00
SR	Deposition Deposition of PI	4.50	\$1,800.00
ED	Deposition Deposition of PI	4.50	\$1,350.00
7/25/2016	SR Preparation Preparation for depositions	2.00	\$800.00
SR	Preparation Preparation of docs for depos	0.80	\$320.00
7/26/2016	SR Deposition Deposition of L Collado, Junior Palma	8.50	\$3,400.00
7/27/2016	ED Draft Draft subpoena	0.63	\$190.00
7/28/2016	SR Preparation Preparation for depos	1.00	\$400.00
7/29/2016	SR Deposition Deposition Junior Palma	3.00	\$1,200.00
ED	Draft Draft status letter to Court	0.75	\$225.00
8/5/2016	ED Draft Draft Second Document Demand	0.30	\$90.00

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		<u>Hours</u>	
8/8/2016 SR	Conference with client Conference with Mund	0.30	\$120.00
8/11/2016 ED	Draft Draft corr to Court	0.25	\$75.00
8/24/2016 ED	Draft Draft corr to Court	0.45	\$135.00
9/6/2016 SR	Draft Draft corr re discovery	0.90	\$360.00
9/19/2016 SR	Review Review Mund docs	2.00	\$800.00
9/21/2016 SR	Preparation Preparation for depositon of Palma	3.00	\$1,200.00
9/27/2016 ED	Draft Draft corr to Court	1.95	\$585.00
10/7/2016 ED	Draft Draft follow-up questions to deposition of Jose Palma re late produced documents	1.33	\$400.00
10/10/2016 ED	Draft Draft opposition to Defendants' request for extension of time to file SJ motion	0.33	\$100.00
ED	Review Review SJ motions	1.25	\$375.00
10/20/2016 ED	Draft Draft letter	0.28	\$85.00
10/27/2016 ED	Draft Draft corr to Court	0.65	\$195.00
11/2/2016 ED	Telephone call with opposing Attorn Telephone call with opposing Attorney and Draft corr to Court	0.23	\$70.00
11/15/2016 SR	Research Research re SJ	3.00	\$1,200.00
11/17/2016 SR	Draft Draft SJ Opp	3.00	\$1,200.00
11/18/2016 SR	Draft Draft SJ Opp	4.00	\$1,600.00

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		<u>Hours</u>	
11/18/2016	SR Draft Draft Opp to SJ	4.00	\$1,600.00
	SR Draft Draft Statement of Material Facts	1.38	\$553.33
11/19/2016	SR Draft Draft Opp to SJ	5.00	\$2,000.00
	ED Draft Draft Opp to SJ	6.00	\$1,800.00
	SR Draft Draft Statement of Material Facts	5.92	\$2,366.67
11/21/2016	SR Draft Draft Opp	3.00	\$1,200.00
	SR Draft Draft Memorandum of Law	5.57	\$1,670.00
11/22/2016	SR Draft Draft SJ Opp Memo of Law	3.80	\$1,520.00
	ED Draft Draft Memorandum of Law	1.93	\$580.00
	ED Draft Draft Material Facts	3.20	\$960.00
11/23/2016	ED Draft Draft Opposition	11.63	\$3,490.00
11/28/2016	SR Research Research re palma	0.70	\$280.00
	SR Preparation Preparation for Mund depos	1.80	\$720.00
	SR Research Research re defenses	2.00	\$800.00
	ED Phone call from client Phone call with HPD	0.30	\$90.00
11/29/2016	SR Conference with client Conference with Def atty, conf re MUnd depos	1.00	\$400.00
	ED Research Research re HPD docs	3.00	\$900.00

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		<u>Hours</u>	
11/29/2016	ED Preparation Obtain certified copies of HPD records	3.00	\$900.00
	ED Draft Draft corr to Court re supplemental opposition	0.50	\$150.00
12/5/2016	ED Draft Draft Request for supplement to opposition	0.37	\$110.00
12/6/2016	SR Review Review depos testimony	0.80	\$320.00
12/7/2016	SR Review Review and revise Supp Opp	1.20	\$480.00
	ED Draft Draft Supplement to opposition	1.43	\$430.00
	ED Revise Revise and file Supplement to opposition	0.28	\$85.00
12/22/2016	ED Preparation Prepare working copies of motion	0.62	\$185.00
12/23/2016	ED Review Review Reply	0.50	\$150.00
10/6/2017	SK Legal Research Legal Research re Single Enterprise/Integrated Enterprise	2.00	\$300.00
10/9/2017	ED Draft Draft Supplemental Briefing per Order	5.47	\$1,640.00
10/10/2017	SR Review Review memo of law, revise and draft	2.80	\$1,120.00
	ED Draft Draft Supplemental Briefing per Order	3.00	\$900.00
	ED Revise Revise brief	1.08	\$325.00
10/26/2017	ED Review Review Defendants' memo of law	0.32	\$95.00
11/1/2017	ED Draft Draft Reply memorandum	2.22	\$665.00

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		<u>Hours</u>	
9/27/2018 ED	Review Review SJ Decision and Order	0.68	\$205.00
ED	Revise Revise Damage calculations after SJ decision	0.62	\$185.00
11/8/2018 SR	Conference with client Conference with Def atty MR	0.50	\$200.00
11/9/2018 SR	Conference with client Conference with J Freeman SDNY	0.50	\$200.00
12/22/2018 SR	Review Review appeal docs, research re appeal	2.00	\$800.00
12/28/2018 ED	Draft Draft and file Acknowledgments and Notices of Appearance with revised caption sheet, and phone with Court Clerk's office	0.68	\$205.00
SR	Preparation Preparation for mediation, file notices	0.60	\$240.00
1/10/2019 ED	Research Research re appeal	1.60	\$480.00
1/19/2019 SR	Preparation Preparation for 2d Cir mediation	2.00	\$800.00
1/23/2019 SR	Court Appearance Court Appearance 2d Cir Mediation	5.00	\$2,000.00
2/5/2019 SR	Review Review and research offer of judgment	1.30	\$520.00
2/8/2019 ED	Draft Draft Voir Dire Questions	0.58	\$175.00
ED	Draft Draft Joint Pretrial Statement	2.65	\$795.00
3/25/2019 SR	Review Review Def motion, research	2.20	\$880.00
4/2/2019 KD	Draft Research and Drafting	4.00	\$600.00
KD	Draft Research and Drafting	3.00	\$450.00

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		<u>Hours</u>	
4/19/2019 SR	Revise corr re Def motion to set aside	1.60	\$640.00
4/23/2019 SR	Revise corr to OC	0.60	\$240.00
6/24/2019 ED	Revise Revise Pretrial Submissions	3.62	\$1,085.00
6/25/2019 ED	Revise Revise Pretrial Submissions and Prepare Exhibits	4.00	\$1,200.00
6/26/2019 ED	Revise Revise Pretrial Submissions and Prepare Exhibits	2.38	\$715.00
ED	Draft Draft corr to Court	1.22	\$365.00
ED	Revise Revise Proposed Jury Instructions	0.23	\$70.00
7/22/2019 ED	Revise Revise joint proposed jury incorporating Defendant's language	2.02	\$605.00
7/25/2019 ED	Revise Revise pretrial statement	1.47	\$440.00
8/7/2019 SR	Court Appearance Court Appearance Pre Trial J. Rakoff	1.50	\$600.00
1/22/2020 ED	Draft Draft Pre Trial Consent Order	1.30	\$390.00
1/27/2020 ED	Revise Revise Pre Trial Consent Order	0.70	\$210.00
ED	Preparation Prepare Trial Exhibits	0.82	\$245.00
1/29/2020 ED	Review Review Defendants edits to Pre Trial Consent Order and revise	0.42	\$125.00
ED	File File Pre Trial Consent Order	0.20	\$60.00
ED	Revise Revise and File Request to Charge	1.20	\$360.00

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		<u>Hours</u>	
1/30/2020 SR	Preparation Preparation for trial, docs, review depos, translator	2.00	\$800.00
	ED Legal Research Legal Research re MTD after rejected Rule 68 offer	0.75	\$225.00
1/31/2020 SR	Conference with client Conference with ED re Def motion, conf call Ct and AR	2.00	\$800.00
	ED Telephone call with opposing Attorn Telephone call with opposing Attorney and Court re Defendants' proposed MTD	0.50	\$150.00
2/2/2020 SR	Review Review for trial	2.00	\$800.00
2/3/2020 SR	Preparation Preparation trial	3.00	\$1,200.00
2/4/2020 SR	Preparation Preparation Trial	5.00	\$2,000.00
	ED Preparation Preparation for Trial	8.00	\$2,400.00
	SR Preparation Preparation Trial	5.00	\$2,000.00
2/5/2020 SR	Preparation Preparation for trial	4.00	\$1,600.00
	SR Preparation Preparation and service of subpoena Mund	3.00	\$1,200.00
ED	Preparation Trial Preparation (AM)	1.67	\$500.00
ED	Court Appearance Court Appearance: Trial	5.50	\$1,650.00
ED	Preparation Trial Preparation (PM)	8.50	\$2,550.00
ED	Travel Travel for trial	0.67	\$100.00

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		<u>Hours</u>	
2/5/2020	SR Court Appearance Court Appearance: Trial	5.50	\$2,200.00
	SR Travel Travel for trial	0.67	\$133.33
2/6/2020	SR Court Appearance Court Appearance Trial	6.00	\$2,400.00
	ED Travel Travel for trial	0.33	\$50.00
	ED Court Appearance Court Appearance: Trial	6.00	\$1,800.00
	ED Preparation Trial Preparation (PM)	5.75	\$1,725.00
	SR Travel Travel for trial	0.33	\$66.67
	SR Preparation trial prep	4.80	\$1,920.00
2/7/2020	SR Court Appearance Court Appearance Trial	6.00	\$2,400.00
	ED Preparation Trial Preparation (PM)	2.00	\$600.00
	ED Court Appearance Court Appearance: Trial	5.75	\$1,725.00
	ED Travel Travel for trial	0.33	\$50.00
	SR Travel Travel for trial	0.33	\$66.67
	SR Preparation Preparation for trial	3.00	\$1,200.00
2/9/2020	SR Preparation Preparation for trial	5.00	\$2,000.00
2/10/2020	SR Court Appearance Trial	3.80	\$1,520.00
	SR Preparation Preparation for summation, jury charge, etc	5.00	\$2,000.00

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			<u>Hours</u>	
2/10/2020	ED	Travel Travel for trial	0.67	\$100.00
	ED	Court Appearance Court Appearance: Trial	3.80	\$1,140.00
	ED	Review Review and revise Jury Instructions, legal research	5.50	\$1,650.00
	SR	Travel Travel for trial	0.67	\$133.33
2/11/2020	SR	Court Appearance Trial	5.50	\$2,200.00
	SR	Preparation Preparation for summ	3.00	\$1,200.00
	ED	Travel Travel for trial	0.33	\$50.00
	ED	Court Appearance Court Appearance: Trial	5.67	\$1,700.00
	ED	Preparation Trial Preparation	2.85	\$855.00
	SR	Travel Travel for trial	0.33	\$66.67
2/12/2020	SR	Court Appearance Court Appearance	4.40	\$1,760.00
	ED	Court Appearance Court Appearance: Trial	4.40	\$1,320.00
	ED	Travel Travel for Trial	0.67	\$100.00
	SR	Travel Travel for Trial	0.67	\$133.33
2/13/2020	ED	Court Appearance Court Appearance: Trial	4.75	\$1,425.00
	ED	Travel Travel for Trial	0.67	\$100.00
	SR	Travel Travel for Trial	0.67	\$133.33

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		<u>Hours</u>	
2/13/2020 SR	Court Appearance Court Appearance: Trial	5.25	\$2,100.00
2/14/2020 SR	Court Appearance Court Appearance Trial	4.50	\$1,800.00
ED	Travel Travel for Trial	0.50	\$75.00
ED	Court Appearance Court Appearance: Trial	4.50	\$1,350.00
SR	Travel Travel for Trial	0.50	\$100.00
2/17/2020 ED	Draft Draft Motion for Restraining Order and Attachment, legal research	1.78	\$535.00
2/21/2020 ED	Draft Draft Proposed Judgment	1.88	\$565.00
3/6/2020 ED	Draft Draft Proposed Order for Attachment and Restraining order	0.78	\$235.00
3/27/2020 ED	Draft Draft application for attorneys' fees and costs	4.17	\$1,250.00
3/28/2020 SR	Review Review conf ED re brief	0.50	\$200.00
3/30/2020 ED	Draft Draft application for attorneys' fees and costs	3.00	\$900.00
3/31/2020 SR	Draft draft applic for atty fees	0.70	\$280.00
ED	Draft Draft application for attorneys' fees and costs	3.08	\$925.00
4/2/2020 SR	Revise revise atty fee app	1.70	\$680.00
4/3/2020 SR	Review Review and finalize memo and atty fee app	1.00	\$400.00

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		<u>Hours</u>	
		422.23	\$143,937.50
		<u>Qty/Price</u>	
For professional services rendered			
Additional Charges :			
8/3/2015 ED	Filing Fee Docket Number	1 400.00	
8/10/2015 ED	Service Fee Service Fee	1 85.00	
1/29/2016 SR	Misc certified copies HPD docs	1 49.20	
6/22/2016 SR	Misc translation for depos Carlos Cruz	1 600.00	
7/28/2016 SR	Misc photos	1 30.00	
12/6/2016 SR	Deposition Costs Deposition Costs for Jose Palma Jr Depos *(Day 1) and Leonida Collado DALCO	1 1,411.45	
SR	Deposition Costs Deposition Costs for Jose Palma Jr Day 2 DALCO	1 535.15	
SR	Deposition Costs Deposition Costs for Jose Palma DALCO	1 748.15	
SR	Deposition Costs Deposition Costs for Mund Depositon (Bust fee) DALCO	1 175.00	
8/8/2017 SR	Translation Carlos Cruz translator fee 7/26/16 and 7/29/19 Palma Palma Jr Collado	1 1,300.00	
12/19/2017 SR	Translation Carlos Criz depos translation for 9.22.16	1 600.00	
7/1/2019 SR	Misc Research fee; Westlaw library	1 1,119.46	
1/29/2020 SR	Copying cost Copying cost. UPS	1 13.89	
2/4/2020 SR	Copying cost Copying cost; trial exhibits	1 200.00	
SR	Misc trial binders	1 300.00	

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			<u>Qty/Price</u>
2/4/2020	SR	Copying cost Copying cost FedEx	1 5.99
SR		Copying cost Copying cost Staples (on amex)	1 60.72
SR		Misc copy and binders FedEx Office (on amex)	1 130.50
SR		Misc Mind witness fee	1 57.00
2/5/2020	SR	Service Fee Service Fee subpoena Mund	1 257.00
SR		Taxi/Car Service taxi w exhinit	1 20.75
2/10/2020	SR	Translation trial translation	1 2,500.00
Total additional charges			<u>\$10,599.26</u>
Total amount of this bill			<u>\$154,536.76</u>
Balance due			<u>\$154,536.76</u>